

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In Re:) **18-26631**
)
BRIANNA SANDERS,) **Chapter 13**
)
Debtor) **Hon. Judge: THORNE**

NOTICE OF MOTION

To the following persons or entities who have been served via electronic mail:

U.S. Bankruptcy Trustee: USTPRegion11.ES.ECF@usdoj.gov

Marilyn O. Marshall, Chapter 13 Trustee: courtdocs@chi13.com

To the following persons or entities who have been served via U.S. Mail:

See attached list.

Please take notice that I shall appear before the following named Bankruptcy Judge, or any other Judge presiding in his or her stead at 219 S. Dearborn Street, Chicago, IL 60604, and in the following courtroom (or any other place posted), and present the attached **Motion to Modify Chapter 13 Plan**, at which time and place you may appear.

JUDGE: THORNE
ROOM: 613
DATE: October 2, 2019
TIME: 9:30 AM

PROOF OF SERVICE

The undersigned certifies that copies of this Notice and attachments were served to the listed persons or entities, if service by mail was indicated above, by depositing same in the U.S. Mail at Wheeling, Illinois 60090, on or before September 10, 2019, at 5:30 p.m., with proper postage prepaid, unless a copy was provided electronically by the Bankruptcy Court.

DATE OF SERVICE: September 10, 2019

/s/ Robert C. Bansfield Jr.

Robert C. Bansfield Jr., A.R.D.C. #6329415

Attorney for the Debtor(s)
DAVID M. SIEGEL & ASSOCIATES
790 Chaddick Drive
Wheeling, IL 60090
(847) 520-8100

To the following persons or entities who have been served via U.S. Mail:

Brianna Sanders
2541 West 70th St. Apt. 1
Chicago, IL 60629

City of Chicago Department of Finance
c/o Arnold Scott Harris P.C.
111 W Jackson Blvd Ste.600
Chicago IL.60604

NPRT0 Illinois, LLC
256 West Data Drive
Draper, UT 84020

Aaron's, Inc.
PO Box 100039
Kennesaw, GA 30156

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BRIANNA SANDERS,)	Chapter 13
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Debtor)	Hon. Judge: THORNE

MOTION TO MODIFY CHAPTER 13 PLAN

NOW COMES the Debtor, **BRIANNA SANDERS**, by and through her attorneys, David M. Siegel & Assoc., LLC, to present this Motion, and in support thereof states as follows:

- 1) This Court has jurisdiction pursuant to 28 U.S.C. § 1334 and Internal Operating Procedure 15(a) of the United States District Court for the Northern District of Illinois Eastern Division.
- 2) Debtor filed a petition for relief under Chapter 13 of Title 11 USC on September 21, 2018.
- 3) The current plan requires payments of \$125.00, per month with General Unsecured Creditors receiving not less than 10% of allowed claims.
- 4) Debtor is currently in default on her plan payments because Debtor needed to have repairs done for the car that she rents from Lyft. Debtor is able to make her current monthly payments but is unable to cure her default.
- 5) Debtor seeks to modify her plan under 11 U.S.C. § 1329, increase her monthly payment in order for her Chapter 13 plan to complete in 60 months, and repay the current default over the remaining span of the plan. This will increase the monthly payment to \$130.00 per month.
- 6) Debtor will be able to afford the increase in her monthly payments by decreasing her costs on various expenses.

- 7) The plan will complete within 60 months if the Debtor's motion is granted and unsecured creditors will still receive no less than 10% of their allowed claims.
- 8) Debtor requests the above relief without any intent to defraud her creditors.

WHEREFORE, the Debtor, BRIANNA SANDERS, prays that this Honorable Court enter an Order to Modify the Chapter 13 Plan and for other such relief as the Court deems fair and proper.

Respectfully Submitted,

/s/ Robert C. Bansfield Jr.
Robert C. Bansfield Jr., A.R.D.C. #6329415
Attorney for the Debtor

David M. Siegel & Associates, LLC
790 Chaddick Drive
Wheeling, IL 60090
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